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[Additional counsel appear on signature page.]

UNITED STATES DISTRICT COURT
DISTRICT OF ALASKA

UNITE HERE NATIONAL RETIREMENT)	No. 3:06-cv-00239-RRB
FUND, LONDON PENSIONS FUND)	
AUTHORITY and JEFFREY PICKETT,)	STIPULATION FOR EXTENSION OF TIME
Derivatively on Behalf of BP P.L.C., BP)	TO RESPOND TO DEFENDANTS' MOTION
AMERICA, INC., BP OIL CO. INC. and BP)	TO DISQUALIFY COUNSEL AND
EXPLORATION (ALASKA) INC.,)	[PROPOSED] ORDER THEREON
)	
Plaintiffs,)	
)	
vs.)	
)	
THE LORD JOHN BROWNE OF)	
MADINGLEY, et al.,)	
)	
Defendants,)	
)	
– and –)	
)	
BP P.L.C., et al.,)	
)	
Nominal Defendants.)	
)	
)	
)	

WHEREAS this shareholder derivative action was commenced on October 2, 2006, in the Superior Court for the State of Alaska, Third Judicial District at Anchorage (“Alaska State Court”);

WHEREAS nominal party BP America Inc. (later joined by all defendants and all other nominal parties) removed this action to this Court on October 24, 2006;

WHEREAS the Court entered a stipulated order on October 31, 2006, deferring the filing of defendants’ responses to the action and anticipated motions to dismiss, stay and/or to transfer until plaintiffs’ anticipated remand motion is decided;

WHEREAS on November 17, 2006, defendants filed a motion to disqualify James E. Fosler as counsel for plaintiffs (the “Disqualification Motion”);

WHEREAS on November 22, 2006, plaintiffs moved to remand this action back to Alaska State Court (the “Remand Motion”); and

WHEREAS the briefing on the Remand Motion is not complete but the parties agree the Disqualification Motion should be decided by the court which ultimately assumes jurisdiction over the action;

THE PARTIES, through their respective counsel, hereby stipulate as follows and seek the Court’s approval that:

1. Defendants’ Disqualification Motion (Docket No. 33) be held in abeyance until after the Court decides plaintiffs’ Remand Motion (Docket No. 36).
2. If the Court denies plaintiffs’ Remand Motion and retains jurisdiction, plaintiffs shall have 10 days from the date of the Court’s order to respond to the Disqualification Motion.

3. If the Court grants the Remand Motion and the case is transferred back to the Alaska State Court, defendants may re-file their Disqualification Motion in the Alaska State Court.

IT IS SO STIPULATED.

DATED: December 4, 2006

FELDMAN ORLANSKY & SANDERS
JEFFREY M. FELDMAN
Alaska Bar No. 7605029

/s/ Jeffrey M. Feldman
JEFFREY M. FELDMAN

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DATED: December 4, 2006

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Alaska Bar No. 9711055

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* * *

ORDER

IT IS SO ORDERED.

DATED: _____

THE HONORABLE RALPH R. BEISTLINE
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 4th day of December 2006 a true and correct copy of this document was served by electronic means through the ECF system on all counsel who have entered an appearance in this case.

By: /s/ James E. Fosler
James E. Fosler, ABA #9711055
Fosler Law Group, Inc.